

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.

NO. CR23-5085-DGE-3

13 3. BRYSON GILL,  
14 Defendant.  
15  
16

**SUPERSEDING INFORMATION  
(AS TO DEFENDANT  
BRYSON GILL ONLY)**

17 The United States Attorney charges that:

18 **COUNT 1**

19 **(Conspiracy to Distribute Controlled Substances)**

20 Beginning at a time unknown, and continuing until at least March 22, 2023, in  
21 Pierce, Mason, Clark, and King Counties, within the Western District of Washington, and  
22 elsewhere, BRYSON GILL, and others known and unknown, did knowingly and  
23 intentionally conspire to distribute controlled substances, including: N-phenyl-N-[1-(2-  
24 phenylethyl)-4-piperidinyl] propanamide (fentanyl), methamphetamine, and heroin,  
25 substances controlled under Title 21, United States Code.

26 The United States Attorney further alleges that BRYSON GILL's conduct as a  
27 member of the conspiracy charged in Count 1, which includes the reasonably foreseeable

1 conduct of other members of the conspiracy charged in Count 1, involved 400 grams or  
2 more of a mixture and substance containing a detectable amount of fentanyl, in violation  
3 of Title 21, United States Code, Sections 841(b)(1)(A).

4 The United States Attorney further alleges that BRYSON GILL's conduct as a  
5 member of the conspiracy charged in Count 1, which includes the reasonably foreseeable  
6 conduct of other members of the conspiracy charged in Count 1, involved 50 grams or  
7 more of methamphetamine, its salts, isomers, or salts of its isomers and 500 grams or  
8 more of a mixture or substance containing a detectable amount of methamphetamine, its  
9 salts, isomers, or salts of its isomers, in violation of Title 21, United States Code,  
10 Sections 841(b)(1)(A).

11 The United States Attorney further alleges that BRYSON GILL's conduct as a  
12 member of the conspiracy charged in Count 1, which includes the reasonably foreseeable  
13 conduct of other members of the conspiracy charged in Count 1, involved 1,000 grams or  
14 more of a mixture or substance containing a detectable amount of heroin, in violation of  
15 Title 21, United States Code, Sections 841(b)(1)(A).

16 All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and  
17 841(b)(1)(A).

## 18 COUNT 2

### 19 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

20 On or about December 9, 2022, in Pierce County, within the Western District of  
21 Washington, BRYSON GILL knowingly possessed firearms, that is, a Winchester 1300  
22 12-gauge shotgun, in furtherance of a drug trafficking crime for which the defendant may  
23 be prosecuted in a court of the United States, namely, *Conspiracy to Distribute*  
24 *Controlled Substances*, as alleged in Count 1 above.

25 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).  
26  
27

**COUNT 3**

**(Conspiracy to Commit Money Laundering)**

**A. The Conspiracy**

Beginning at a time unknown, and continuing until at least March 16, 2023, in Pierce, Mason, Clark, and King Counties, within the Western District of Washington, and elsewhere, BRYSON GILL, and others known and unknown, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit:

1. To knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is Conspiracy to Distribute Controlled Substances, as charged in Count 1, with the intent to promote the carrying on of specified unlawful activity, that is Distribution of Controlled Substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

2. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled Substances, as charged in Count 1, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

1           3.       To knowingly engage and attempt to engage, in monetary  
2 transactions by, through or to a financial institution, affecting interstate and foreign  
3 commerce, in criminally derived property of a value greater than \$10,000, that is a  
4 deposit, withdrawal, transfer, and exchange of United States currency, funds, and  
5 monetary instruments, such property having been derived from a specified unlawful  
6 activity, that is, Conspiracy to Distribute Controlled Substances, as charged in Count 1, in  
7 violation of Title 18, United States Code, Section 1957.

8 **B.     Manner and Means**

9       The manner and means used to accomplish the objectives of the conspiracy  
10 included, among others, the following:

11           1.       BRYSON GILL, and others known and unknown, formed business  
12 entities including, without limitation, Family Ties Enterprise, LLC, doing business as  
13 Kash Flo Kennels, Kash Flo Klothing, Kash Flo Kuisine, and Kash Flo Kurrency  
14 (collectively, "Family Ties"), and Kash Flo Kennels AZ LLC ("KFK AZ"), which  
15 BRYSON GILL and others used and intended to use, at least in part, to conceal and  
16 disguise the nature, location, source, ownership, and control of proceeds of the  
17 distribution of controlled substances.

18           2.       BRYSON GILL, and others known and unknown, opened accounts  
19 in Family Ties' name at financial institutions including, without limitation, Washington  
20 State Employees Credit Union ("WSECU") and Block, Inc. ("Cash App"), with the  
21 design of using the accounts, at least in part, to conceal and disguise the nature, location,  
22 source, ownership, and control of proceeds of the distribution of controlled substances.

23           3.       BRYSON GILL, and others known and unknown, deposited  
24 proceeds of the distribution of controlled substances in the form of United States  
25 currency in Family Ties' accounts including, without limitation, its WSECU account  
26 ending -5078, all with the design to conceal and disguise the nature, location, source,  
27 ownership, and control of proceeds of the distribution of controlled substances.

1           4.       BRYSON GILL, and others known and unknown, directed  
2 purchasers of controlled substances to send funds used to purchase controlled substances  
3 to Family Ties' Cash App account and to include notes for the transactions that falsely  
4 stated the funds were for payment of legitimate goods and services purchased from  
5 Family Ties, including dogs, dog supplies, and dog training and boarding services, among  
6 others, all with the design to conceal and disguise the nature, location, source, ownership,  
7 and control of proceeds of the distribution of controlled substances.

8           5.       BRYSON GILL, and others known and unknown, sent funds in  
9 Family Ties' Cash App account, which contained proceeds of the distribution of  
10 controlled substances, to Family Ties' WSECU account ending -5078 and to the  
11 CashApp accounts of other members of the conspiracy to distribute controlled  
12 substances, all with the design to conceal and disguise the nature, location, source,  
13 ownership, and control of proceeds of the distribution of controlled substances.

14           6.       BRYSON GILL, and others known and unknown, used United  
15 States currency and funds in Family Ties' WSECU account ending -5078, which  
16 contained proceeds of the distribution of controlled substances, to purchase jewelry,  
17 luxury vehicles, and other goods and services for BRYSON GILL's and others' personal  
18 benefit, all with the design to conceal and disguise the nature, location, source,  
19 ownership, and control of proceeds of the distribution of controlled substances.

20           7.       BRYSON GILL, and others known and unknown, paid salaries to  
21 members of the conspiracy including, using funds containing proceeds of the distribution  
22 of controlled substances, all with the design to conceal and disguise the nature, location,  
23 source, ownership, and control of proceeds of the distribution of controlled substances.

24           8.       BRYSON GILL, and others known and unknown, filed federal tax  
25 returns falsely claiming that proceeds of the distribution of controlled substances  
26 deposited in Family Ties' accounts represented revenues from Family Ties' purported  
27 legitimate business activities, and that salaries paid to members of the conspiracy

1 represented legitimate business expenses, all with the design to conceal and disguise the  
2 nature, location, source, ownership, and control of proceeds of the distribution of  
3 controlled substances.

4           9.       BRYSON GILL, and others known and unknown, filed federal tax  
5 returns falsely claiming that proceeds of the distribution of controlled substances  
6 deposited in Family Ties' accounts represented revenues from Family Ties' purported  
7 legitimate business activities, and that salaries paid to members of the conspiracy  
8 represented legitimate business expenses, all with the design to conceal and disguise the  
9 nature, location, source, ownership, and control of proceeds of the distribution of  
10 controlled substances.

11           10.       Co-conspirators formed business entities including, without  
12 limitation, Sonoran Asset Management LLC ("Sonoran"), which they used to pay salaries  
13 to members of the conspiracy including, without limitation, BRYSON GILL, using funds  
14 containing proceeds of the distribution of controlled substances, all with the design to  
15 conceal and disguise the nature, location, source, ownership, and control of proceeds of  
16 the distribution of controlled substances.

17           11.       BRYSON GILL, and others known and unknown, used proceeds of  
18 the distribution of controlled substances to purchase real properties located at 49 & 50  
19 County Road N9012, Concho, Arizona, 85924 (collectively, the "Concho Parcels"), for  
20 the benefit of BRYSON GILL and others, using nominal owners, all with the design to  
21 conceal and disguise the nature, location, source, ownership, and control of proceeds of  
22 the distribution of controlled substances.

23           12.       BRYSON GILL, and others known and unknown, used proceeds of  
24 the distribution of controlled substances to purchase equipment and bulk chemical  
25 compounds commonly used to manufacture controlled substances including, without  
26 limitation, a pill press, caffeine anhydrous, and lactose, which they intended to use to  
27 promote the conspiracy to distribute controlled substances described above.

13. BRYSON GILL, and others known and unknown, used proceeds of the distribution of controlled substances to pay for real property used in furtherance of the conspiracy to distribute controlled substances described above.

14. BRYSON GILL, and others known and unknown, deposited more than \$10,000 in proceeds of the distribution of controlled substances in Family Ties' WSECU account ending -5078.

15. BRYSON GILL, and others known and unknown, used more than \$10,000 in proceeds of the distribution of controlled substances to purchase real and personal property including, without limitation, the Concho Parcels, jewelry, and luxury vehicles.

16. BRYSON GILL, and others known and unknown, conducted, caused to be conducted, and aided and abetted the conducting of the following financial and monetary transactions on or about the following dates, among others:

Date	Amount	Description of Transactions
01/20/2021	\$1,800.00	Transfer of funds via Cash App from J.R. to C.L.M.
03/31/2021	\$2,792.72	Transfer of funds from Bank of America account ending -3500 to LFA Machines Bichester in connection with purchase of TDP 5 pill press
04/10/2021	\$11,000.00	Transfer of United States currency to Payless Auto Sales Inc in connection with purchase of 2013 Land Rover
04/19/2021	\$4,916.26	Transfer of funds from Bank of America account ending -3500 to LFA Machines Bichester in connection with purchase of TDP 5 pill press
04/30/2021	\$1,000.00	Transfer of funds via Cash App from J.R. to C.L.M.
05/12/2021	\$1,500.00	Transfer of funds via Cash App from J.R. to C.L.M.
05/18/2021	\$1,083.12	Transfer of funds from WSECU account ending -5078 to Ingredient Depot in connection with purchase of caffeine anhydrous
05/26/2021	\$242.71	Transfer of funds from WSECU account ending -5078 to Ingredient Depot in connection with purchase of lactose
06/30/2021	\$27,500.00	Deposit of United States currency in WSECU account ending -5078
08/13/2021	\$18,000.00	Deposit of United States currency in WSECU account ending -5078



	Date	Amount	Description of Transactions
1	08/30/2021	\$20,000.00	Deposit of United States currency in WSECU account ending -5078
2			
3	09/03/2021	\$1,000.00	Transfer of funds via Cash App from J.R. to C.L.M.
4	09/17/2021	\$1,595.00	Transfer of funds via Cash App from Family Ties Enterprise LLC to J.R.
5	09/20/2021	\$30,000.00	Deposit of United States currency in WSECU account ending -5078
6	09/25/2021	\$1,500.00	Transfer of funds via Cash App from J.R. to C.L.M.
7	10/07/2021	\$9,000.00	Transfer of United States currency to Northwest Motorsport in connection with purchase of 2020 GMC Sierra 2500HD 4WD
8			
9	10/23/2021	\$1,400.00	Transfer of funds via Cash App from Family Ties Enterprise LLC to J.R.
10	10/28/2021	\$10,020.00	Deposit of United States currency in WSECU account ending -5078
11	11/05/2021	\$1,000.00	Transfer of funds via Cash App from Family Ties Enterprise LLC to C.L.M.
12			
13	11/17/2021	\$20,000.00	Deposit of United States currency in WSECU account ending -5078
14	12/01/2021	\$23,100.00	Deposit of United States currency in WSECU account ending -5078
15	12/06/2021	\$16,420.00	Deposit of United States currency in WSECU account ending -5078
16	12/06/2021	\$3,347.21	Transfer of funds from Bank of America account ending -3500 with notation rps*Muse Rd
17			
18	12/20/2021	\$281,460.00	Deposit of United States currency in WSECU account ending -5078
19	12/24/2021	\$1,595.48	Transfer of funds from Bank of America account ending -3500 to WSECU account ending -5072 with notation Payroll Sonoran Asset Management
20			
21	01/05/2022	\$3,037.49	Transfer of funds from WSECU account ending -5078 rps*Muse Rd
22	01/07/2022	\$1,597.57	Transfer of funds from Bank of America account ending -3500 to WSECU account ending -5072 with notation Payroll Sonoran Asset Management
23			
24	01/21/2022	\$1,597.58	Transfer of funds from Bank of America account ending -3500 to WSECU account ending -5072 with notation Payroll Sonoran Asset Management
25			
26	02/08/2022	\$1,597.57	Transfer of funds from Bank of America account ending -3500 to WSECU account ending -5072 with notation Payroll Sonoran Asset Management
27			



	Date	Amount	Description of Transactions
1	02/18/2022	\$1,597.58	Transfer of funds from Bank of America account
2			ending -3500 to WSECU account ending -5072 with
3			notation Payroll Sonoran Asset Management
4	03/14/2022	\$5,000.00	Transfer of funds via Cash App from C.L.M. to Family
5			Ties Enterprise LLC
6	04/12/2022	\$1,000.00	Transfer of funds via Cash App from Family Ties
7			Enterprise LLC to J.R.
8	04/12/2022	\$400.00	Transfer of funds via Cash App from J.R. to C.L.M.
9	04/23/2022	\$2,500.00	Transfer of funds via Cash App from Family Ties
10			Enterprise LLC to J.R.
11	05/21/2022	\$23,500.00	Transfer of United States currency to Catalina Holdings
12			Inc. in connection with purchase of jewelry
13	05/21/2022	\$17,810.00	Transfer of funds to Catalina Holdings Inc. from WSECU
14			account ending -5078 in connection with purchase of
15			jewelry
16	06/19/2022	\$550.00	Transfer of funds via Cash App from Family Ties
17			Enterprise LLC to J.R.
18	06/28/2022	\$4,000.00	Transfer of funds via Cash App from Family Ties
19			Enterprise LLC to Capri Jewelers
20	07/06/2022	\$25,100.00	Deposit of United States currency in WSECU account
21			ending -5078
22	08/28/2022	\$39,000.00	Transfer of United States currency to BMW of Spokane in
23			connection with purchase of 2022 BMW X6
24	09/06/2022	\$19,000.00	Deposit of United States currency in WSECU account
25			ending -5078
26	09/08/2022	\$2,000.00	Transfer of funds via Cash App from Family Ties
27			Enterprise LLC to J.R.
28	09/08/2022	\$2,400.00	Transfer of funds via Cash App from J.R. to Family Ties
29			Enterprise LLC
30	09/09/2022	\$14,960.00	Deposit of United States currency in WSECU account
31			ending -5078
32	09/21/2022	\$37,000.00	Transfer of Wells Fargo cashier's check no. 0883502446 in
33			connection with purchase of 49 County Road N9012,
34			Concho, Arizona, 85924
35	09/26/2022	\$23,030.00	Deposit of United States currency in WSECU account
36			ending -5078
37	10/05/2022	\$10,020.00	Deposit of United States currency in WSECU account
38			ending -5078
39	10/11/2022	\$16,000.00	Deposit of United States currency in WSECU account
40			ending -5078
41	10/12/2022	\$1,000.00	Transfer of funds via Cash App from Family Ties
42			Enterprise LLC to El Cuh

Date	Amount	Description of Transactions
10/31/2022	\$27,860.00	Deposit of United States currency in WSECU account ending -5078
11/28/2022	\$33,000.00	Deposit of United States currency in WSECU account ending -5078
12/05/2022	\$4,000.00	Transfer of funds via Cash App from Family Ties Enterprise LLC to El Cuh
12/16/2022	\$22,000.00	Deposit of United States currency in WSECU account ending -4914
12/16/2022	\$22,000.00	Transfer of funds from WSECU account ending -4914 to Pioneer Title Agency Inc. for the benefit of L.G. in connection with purchase of 49 County Road N9012, Concho, Arizona, 85924
12/28/2022	\$15,000.00	Deposit of United States currency in WSECU account ending -5078

All in violation of Title 18, United States Code, Section 1956(h).

### **FORFEITURE ALLEGATION**

The allegations contained in Counts 1–3 of this Superseding Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, BRYSON GILL shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting or derived from proceeds traceable to the offense, as well as any property used or intended to be used to facilitate the offense. This property includes, but is not limited to:

- a. a judgment for a sum of money (also known as a forfeiture money judgment) in an amount representing the proceeds the defendant obtained, directly and indirectly, as a result of his commission of the offense;
- b. the real property with address 50 County Road N9012, Concho, Arizona, 85924;
- c. the real property with address 49 County Road N9012, Concho, Arizona, 85924;
- d. the following amounts of United States currency, seized from 9013 204th

Street East, Graham, WA, on or about December 9, 2022:

- \$59,799.00;
- \$10,415.00;
- \$6,512.00;
- \$1,745.00;
- \$1,238.00; and
- \$34.00;

e. \$2,610.00 in United States currency seized from a purse on the floor of 22721

West Grove Street, Buckeye, WA, on or about March 22, 2023;

f. \$1,795.47 in United States funds seized from Washington State Employees

Credit Union account ending -5078 on or about March 22, 2023;

g. the following vehicles seized from 9013 204th Street East, Graham, WA, on or about December 9, 2022:

- one 2018 Dodge Charger, VIN: 2C3CDXL93JH328602; and
- one 2016 Polaris RZR;

h. the following firearms, firearm accessories, and ammunition seized from 931

SE State Route 3, Shelton, WA, on or about December 9, 2022:

- one Mossberg 500 12-gauge shotgun; and
- one Smith & Wesson M&P 15 5.56 caliber rifle with magazine; and

i. the following firearms, firearm accessories, and ammunition seized from 49 &

50 North 9012, Concho, AZ, on or about March 22, 2023:

- one Smith & Wesson 4013 handgun, bearing serial number VBA3729;
- one Glock GMBH 22 pistol, bearing serial number YVB129;
- one HS Produkt (IM METAL) Model XD40 pistol, bearing serial number US407482;
- one Aero Precision M4E1, bearing serial number 4JULY-4311;
- one FN Herstal PS90 rifle, bearing serial number FN065952;

- one Smith & Wesson CS45 Chiefs Special pistol, bearing serial number VJC7049;
- one Sig Sauer P250 handgun, bearing serial number EAK019664;
- two Polymer80 Inc PF940C pistols;
- one Glock GMBH 27 handgun, bearing serial number HSA472;
- one Ruger Security six revolver, bearing serial number 153-39369;
- one Smith & Wesson 38 Airweight revolver;
- one Smith & Wesson SD9VE pistol, bearing serial number FXT8383;
- one Calwestco Inc. J22 pistol, bearing serial number 550432;
- one Glock GMBH Model 35 pistol, bearing serial number HBR558;
- one Hawk Industries Inc. Nef Pardner shotgun, bearing serial number NZ722392;
- one Stoeger P3000 shotgun, bearing serial number 1914198;
- one JLD Enterprises PTR-91 rifle, bearing serial number A5740;
- one Belgium 1893 Nagant revolver, bearing serial number EC740;
- one Honor Defense LLC Honor Guard pistol, bearing serial number 14211;
- one Glock GMBH Model 20 pistol, bearing serial number BMTF432;
- one Fratelli Tanfoglio pistol, bearing serial number EB32336;
- one Unique Model 17 pistol, bearing serial number 400095;
- one HS Produkt XD40SL pistol, bearing serial number XD421487;
- one Chongqing Jianshe Machinery M12AK shotgun, SN ML2002251;
- one Hatsan Escort Magnum shotgun, bearing serial number 300477;
- one Anderson AM-15 rifle, bearing serial number 18046872;
- one Tokarev Savuma Silah Sanay 12 gauge shotgun, bearing serial number 52-I21YD-3039;
- one Sig Sauer 556 rifle, bearing serial number JT019335;

- one Hi-Point Model C pistol, bearing serial number P10108566;
- one Glock GMBH pistol, bearing serial number HZW728 and HZW625;
- one Polymer80 Inc. PF45 pistol;
- one Radical Firearms RF-15 rifle, bearing serial number 19-104951;
- one Hi-Point 4095TS rifle, bearing serial number H37920;
- one Masterpiece Arms handgun, bearing serial number A11347;
- one Volunteer Enterprises Commando MK III rifle, bearing SN 45P00715;
- one Hatsan Escort shotgun, bearing serial number 915848;
- one HS Produkt XD40 pistol, bearing serial number BY447365;
- one HS Produkt XD45 pistol, bearing serial number GM475888;
- one Anderson AM-15 rifle, bearing serial number 16422209;
- one AR style rifle;
- one Standard Manufacturing DP-12 shotgun, SN: DP12096;
- one ROMARM Micro Draco pistol, SN: 21PMD-24859;
- one SOTA Arms Inc. rifle, bearing serial number 3577;
- one Yugoslavia rifle/knife, bearing serial number L-460011;
- one Norinco rifle, bearing serial number 10396588;
- one unmarked Micro rifle;
- one Arsenal SAM7 rifle; and
- any associated accessories, magazines, and ammunition.

Upon conviction of the offense alleged in Count 2, BRYSON GILL shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and ammunition that were involved in or used in the offense.

Upon conviction of the offense alleged in Count 3, BRYSON GILL shall forfeit to

the United States, pursuant Title 18, United States Code, Section 982(a)(1), any property involved in, or traceable to property involved in, the offense. This property includes, but is not limited to:

- a. a forfeiture money judgment in an amount representing the value of the property involved in the offense;
- b. the real property with address 50 County Road N9012, Concho, Arizona, 85924;
- c. the real property with address 49 County Road N9012, Concho, Arizona, 85924;
- d. the following amounts of United States currency, seized from 9013 204th Street East, Graham, WA, on or about December 9, 2022:
  - \$59,799.00;
  - \$10,415.00;
  - \$6,512.00;
  - \$1,745.00;
  - \$1,238.00; and
  - \$34.00;
- e. \$1,795.47 in United States funds seized from Washington State Employees Credit Union account ending -5078 on or about March 22, 2023; and
- f. the following vehicles seized from 9013 204th Street East, Graham, WA, on or about December 9, 2022:
  - one 2018 Dodge Charger, VIN: 2C3CDXL93JH328602; and
  - one 2016 Polaris RZR.

**Substitute Assets.** If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

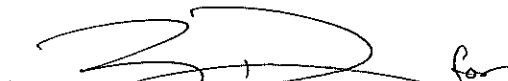
1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with a third party;

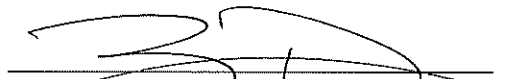
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or,
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

DATED this 7<sup>th</sup> day of February, 2025.

  
TESSA M. GORMAN  
United States Attorney

  
VINCENT T. LOMBARDI  
Assistant United States Attorney

  
ZACHARY W. DILLON  
~~MAX B. SHINER~~  
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